

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF SOUTH CAROLINA**  
**CHARLESTON DIVISION**

**John Schrage,**

**Plaintiff,**

**v.**

**Hristos V Kaltsas**

**Defendant.**

**Case No.: 2:24-CV-4382**

**SECOND AMENDED SCHEDULING  
ORDER**

Pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules of this District, the following schedule is established for this case. This order is entered to administer the trial of cases in a manner consistent with the ends of justice, in the shortest possible time, and at the least possible cost to litigants.

6. Expert Witnesses: Parties shall file and serve a document identifying by full name, address, and telephone number each person whom they expect to call as an expert at trial and certifying that a written report prepared and signed by any expert including all information required by Fed. R. Civ. P. 26(a)(2)(B), has been disclosed to the parties by the following dates:

Plaintiff: **April 30, 2025**

Defendant: **May 28, 2025**

7. Records Custodian Witnesses: Counsel shall file and serve affidavits of records custodian witnesses proposed to be presented by affidavit at trial no later than **June 5, 2025**. Objections to such affidavits must be made within fourteen (14) days after the service of the disclosure. *See* Fed. R. Evid. 803(6), 902(11), or 902(12) and Local Civil Rule 16.02(D)(3).
8. Discovery: Discovery shall be completed no later than **June 27, 2025**. All discovery requests shall be served in time for the responses thereto to be served by this date. De bene esse depositions must be completed by discovery deadline. No motions relating to discovery shall be filed until counsel have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02.

9. Motions in Limine: Motions in limine must be filed no sooner than fifteen (15) days and no later than ten (10) days prior to the date certain set for jury selection and trial.
10. Dispositive Motions and Daubert Motions: All dispositive motions and Daubert motions shall be filed on or before **July 9, 2025**.
11. Mediation: Mediation shall be conducted in accord with this Court's Order to Conduct Mediation (ECF # 11); however, the deadline to complete mediation shall be extended until **July 28, 2025**.
12. Pretrial Disclosures: No later than **twenty-one (21) business days prior to jury selection**, the parties shall file and exchange Fed. R. Civ. P. 26(a)(3) pretrial disclosures. Within fourteen (14) days thereafter, a party shall file and exchange Fed. R. Civ. P. 26(a)(3) objections, any objections to use of a deposition designated by another party and any deposition counter-designations under Fed. R. Civ. P. 32(a)(4).
13. Pretrial Briefs: Parties shall furnish the Court and serve pretrial briefs **five (5) business days prior to the date set for jury selection** (Local Civil Rule 26.05). Attorneys shall meet at least five (5) business days prior to the date set for submission of pretrial briefs for the purpose of exchanging and marking all exhibits. See Local Civil Rule 26.07.
14. Trial: This case is subject to being called for jury selection and/or trial on or after **October 05, 2025**.

**AND IT IS SO ORDERED.**

March 17, 2024

s/ Richard Mark Gergel  
United States District Judge